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autographical value is, however, such an unsubstantial and trivial interest that equity would dismiss the suit as vexatious, were it not for the interest of personality involved. The real interest protected by the court is not a property interest but the interest of personality of the writer. See *Roscoe Pound*, "Equitable Relief Against Defamation and Injuries to Personality," 29 HARV. L. REV. 640, 643, 671. The courts have, however, almost universally put the jurisdiction of equity on the basis of protection of property interests. *Woolsey Judd*, 4 Duer (N. Y.) 379; *Baker v. Libbie*, 210 Mass. 599, 97 N. E. 109; *Labouchere v. Hess*, 77 L. T. (N. S.) 559. See *Folsom v. Marsh*, 2 Story (U. S. Dist. Ct.) 100, 110. It is only by *dicta* that a few courts have asserted that equity will protect the rights of personality in such cases, apart from any property right. See *Vanderbilt v. Mitchell*, 72 N. J. Eq. 910, 919, 67 Atl. 97, 100; *Itzkowitz v. Whitaker*, 115 La. 479, 480; 39 So. 499, 500, 117 La. 708, 710, 42 So. 228, 229; *Munden v. Harris*, 153 Mo. App. 652, 659, 134 S. W. 1076, 1079.

INTERSTATE COMMERCE — CONTROL BY STATE — POLICE POWER OF STATE — INTEREST OF PUBLIC HEALTH — PROHIBITION OF CONDENSED MILK MADE OF SKIMMED MILK. — The plaintiffs, manufacturers of a compound of evaporated skimmed milk and vegetable fat, a wholesome product, properly labeled under the Federal Pure Food Act, sought to enjoin the enforcement of an Ohio statute prohibiting the manufacture and sale of condensed milk made from skimmed milk, on the ground that it was unconstitutional. (OHIO GEN. CODE, § 12725.) The milk was manufactured and shipped from without the state into Ohio for sale. *Held*, that relief be denied. *Hebe Co. v. Calvert*, 246 Fed. 711.

It is clear that a state in the exercise of its police power may enact laws which will be valid, though they indirectly affect interstate commerce. *Savage v. Jones*, 225 U. S. 501; *Hennington v. Georgia*, 163 U. S. 299. A statute, however, palpably directed at evading the commerce clause is objectionable. *Welton v. Missouri*, 91 U. S. 275; *Walling v. Michigan*, 116 U. S. 446. A state regulation must not exceed the exigencies of the case. *Railroad Co. v. Husen*, 95 U. S. 465. Nor may it render unsalable articles of interstate commerce. *Collins v. New Hampshire*, 171 U. S. 30. The question in the particular case must be: Is the interference with interstate commerce unreasonable? This involves balancing the importance and necessity of police regulation on the one hand and the extent of encroachment on interstate commerce on the other. Police power may justify a statute as due process under the Fourteenth Amendment. *Powell v. Pennsylvania*, 127 U. S. 678. But only a necessary exercise of that power will justify interference with interstate commerce. *Schollenberger v. Pennsylvania*, 171 U. S. 1. A drastic state law prohibiting the sale of oleomargarine, so colored as to resemble butter, has been upheld by the Supreme Court as a legitimate police provision against fraud. *Plumley v. Massachusetts*, 155 U. S. 461. The principal case follows that decision and sanctions a statute equally as paternalistic, arguing that despite the proper label, some one may be deceived.

INTERSTATE COMMERCE — INTERSTATE COMMERCE COMMISSION — ORDER OF THE COMMISSION INOPERATIVE THROUGH UNCERTAINTY. — An Illinois statute prohibited any intra-state passenger rate in excess of two cents per mile. Certain carriers having raised the interstate rate to 2.4 cents per mile, the Interstate Commerce Commission found this created a discrimination between intra-state and interstate shipments, and ordered the railroads to desist from "collecting passenger fares between St. Louis, Missouri, and points in Illinois upon a basis higher than 2.4 cents per mile, . . . which basis was found reasonable . . ., or higher than the fares contemporaneously exacted between East St. Louis, Illinois, and the same Illinois points." The carriers raised